

ESTTA Tracking number: **ESTTA312265**

Filing date: **10/19/2009**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91191881
Party	Defendant Kunshan Geoby Paragon Co., Ltd.
Correspondence Address	STEPHEN C. BEUERLE PROCOPIO CORY HARGREAVES & SAVITCH LLP 530 B STREET SUITE 2100 SAN DIEGO, CA 92101-4469 docketing@procopio.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Stephen C. Beuerle
Filer's e-mail	docketing@procopio.com,slh@procopio.com
Signature	/Stephen C. Beuerle/
Date	10/19/2009
Attachments	114630-004-Peregon Peg Perego stipulation for extension of time to answer opposition.pdf (4 pages)(95430 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Peg Perego U.S.A., Inc.)	Opposition No. 91191881
)	
Opposer,)	Trademark Application No. 77/535,895
)	
v.)	Filing Date: July 31, 2008
)	
Kunshan Geoby Paragon Co., Ltd.)	Published: July 14, 2009
)	
Applicant.)	

STIPULATION EXTENDING TIME FOR ANSWER OR OTHERWISE RESPOND
TO THE NOTICE OF OPPOSITION

Kunshan Geoby Paragon Co., Ltd. (“Kunshan”), having a place of business at No. 10 Lufeng East Road Lujia Town, Jiangsu Province, Kunshan City, China, by its attorney, Stephen C. Beuerle of Procopio Cory Hargreaves & Savitch LLP, 530 B Street, Suite 2100, San Diego, CA 92101, requests that the time for filing an Answer or other Responsive Pleading to the Notice of Opposition in the above proceeding be extended thirty (30) days, to and including November 20, 2009.

Counsel for Peg Perego U.S.A., Inc., Jonathan Froemel of Barnes & Thornberg LLP, has provided written consent to this extension by email correspondence dated October 15, 2009. This stipulation is signed by counsel for Applicant with the written consent of counsel for the Opposer.

This extension request is not made for purposes of delay. The parties need additional time to discuss the issues underlying this dispute and explore the possibility of settlement, before

proceeding herein. It is therefore respectfully requested that the additional time to answer or otherwise respond to the Notice of Opposition be granted.

Respectfully submitted,

A handwritten signature in blue ink that reads "Stephen C. Beuerle". The signature is written in a cursive, flowing style.

Dated: October 19, 2009

By _____
Stephen C. Beuerle
Attorneys for Applicant

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Attorneys for Applicant

CERTIFICATE OF TRANSMITTAL

I hereby certify that this correspondence is being electronically transmitted, in PDF format, to the Trademark Trial and Appeal Board through the Electronic System for Trademark Trial and Appeals (ESTTA) on October 19, 2009.

By Stephy C. Baul

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Stipulation Extending Time for Answer or Otherwise Respond to the Notice of Opposition has been served on Counsel for Peg Perego U.S.A., Inc., Jonathan Froemel of Barnes & Thornberg LLP by U.S. mail. Postage prepaid, on October 19, 2009 to:

Joseph P. Froemel
Michael Wever
Barnes & Thornburg LLP
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